

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

CHRISTINE WOODS,	:	
Plaintiff	:	No. 4:17-cv-00756-CCC
	:	
vs.	:	Chief Judge Christopher C. Connor
	:	
CLINTON COUNTY,	:	
Defendant	:	Jury Trial Demanded

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

NOW COMES Defendant Clinton County pursuant to F. R. Civ. P. 56 and respectfully represents:

1. Plaintiff Christine Woods (Woods) commenced this civil action against Defendant Clinton County (Clinton County) by filing a Complaint on April 28, 2017.
2. Clinton County filed an Answer on May 30, 2017 and the pleadings were closed.
3. Fact discovery was completed on or before February 28, 2018, pursuant to this Court’s Case Management Order.
4. In this civil action Woods asserts claims against Clinton County under Title VII of the Civil Rights Act (42 U.S.C. § 2000e–2(a)(1)) (Title

VII) and Section 995 of the Pennsylvania Human Relations Act (43 P. S. § 955 (a)) (PHRA) contending that Clinton County discriminated against her on the basis of her sex by failing to promote her, creating a hostile work environment and constructively discharging her.

5. For the reasons set forth more specifically in Clinton County's Brief in Support of Motion for Summary Judgment filed contemporaneously herewith, Clinton County is entitled to judgment in its favor as a matter of law on Woods' claim that it discriminated against her on the basis of her sex by failing to promote her. Among other reasons, Woods has failed to present evidence sufficient to satisfy her burden of proving Clinton County's evidence of legitimate non-discriminatory reasons for promoting / hiring other persons was merely a pretext for discrimination.

6. For the reasons set forth more specifically in Clinton County's Brief in Support of Motion for Summary Judgment filed contemporaneously herewith, Clinton County is entitled to judgment in its favor as a matter of law on Woods' claim that it discriminated against her on the basis of her sex by creating a hostile work environment. Among other reasons, Woods has failed to present evidence sufficient to satisfy her burden of proving that Clinton County's conduct constituted a hostile work environment or that Clinton County is subject to *respondeat superior* liability.

7. For the reasons set forth more specifically in Clinton County's Brief in Support of Motion for Summary Judgment filed contemporaneously herewith, Clinton County is entitled to judgment in its favor as a matter of law on Woods' claim that it discriminated against her on the basis of her sex by constructively discharging her. Among other reasons, Woods has failed to present evidence sufficient to satisfy her burden of proving that Clinton County's conduct justified her termination of employment.

WHEREFORE, Defendant Clinton County respectfully requests that summary judgment be entered in its favor on Plaintiff Christine Woods' claims under Title VII and the PHRA and that the Complaint be dismissed as to it.

LEE, GREEN & REITER, INC.

By: /s/ Robert A. Mix
Robert A. Mix, Esquire
Supreme Court ID # 16164
Attorney for Defendant
115 East High Street
PO Box 179
Bellefonte, PA 16823
(814)-355-4769
bmix@lmgrlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendant Clinton County's Motion for Summary Judgment was served via EM / ECF, on the 30th day of March, 2017 on the following:

Joshua Cochran, Esquire
Schemery Zicolello
333 Market Street
Williamsport, PA 17701

s/Robert A. Mix

Robert A. Mix, Esquire